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9 TP-Link USA Corporation and
Third-Party Defendant TP-Link North America, Inc.
10

11 UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

12 SOUTHERN DIVISION

13 TP-LINK USA CORPORATION,

14 Plaintiff,

15 v.

16 CAREFUL SHOPPER, LLC, ADAM
STARKE, SORA STARKE, and DOES
1 through 10, inclusive,

17 Defendants.
18

19 CAREFUL SHOPPER, LLC,

20 Counterclaimant-
21 Third-Party Plaintiff,
22

23 v.

24 TP-LINK USA NORTH AMERICA
INC. and AUCTION BROTHERS, INC.
dba AMAZZIA,
25

26 Third-Party Defendants.
27

CASE NO.: 8:19-CV-00082-JLS-KES

Hon. Josephine L. Staton

**JOINT STIPULATION FOR ORDER
REGARDING ENLARGEMENT OF
CAREFUL SHOPPER'S BRIEF IN
OPPOSITION TO TP-LINK'S
MOTION TO STRIKE AND/OR
DISMISS**

Hearing Date: March 13, 2020
Hearing Time: 10:30 a.m.
Courtroom: 10A

Complaint Filed: Jan. 15, 2019

Answer, Counterclaims and Third-Party
Complaint Filed: Nov. 12, 2019

Amended Answer, Counterclaims and
Third-Party Complaint Filed: Jan. 3,
2020

1 Plaintiff TP-Link USA Corporation (“TP-Link USA”) and Third-Party
 2 Defendant TP-Link North America, Inc. (“TP-Link NA”) (together, “TP-Link”) and
 3 Careful Shopper, LLC (“CSC”) (collectively, the “Parties”), by and through their
 4 respective undersigned counsel, and subject to this Court’s approval, stipulate and
 5 agree as follows:

6 WHEREAS, on January 15, 2019, TP-Link USA filed the Complaint in this
 7 action naming CSC, Adam J. Starke and Sora Starke as Defendants (ECF No. 1);

8 WHEREAS, on November 12, 2019: (1) CSC, Adam J. Starke and Sora Starke
 9 filed an Answer to the Complaint; (2) CSC filed Counterclaims against TP-Link USA;
 10 and (3) CSC filed a Third-Party Complaint against TP-Link NA and Auction Brothers,
 11 Inc. dba Amazzia (“Amazzia”) (ECF No. 36);

12 WHEREAS, on January 3, 2020, (1) CSC, Adam J. Starke and Sora Starke filed
 13 an Amended Answer to the Complaint; (2) CSC filed Amended Counterclaims against
 14 TP-Link USA; and (3) CSC filed an Amended Third-Party Complaint against TP-Link
 15 NA and Amazzia (ECF No. 54);

16 WHEREAS, on January 17, 2020, TP-Link filed a Motion to Strike and/or
 17 Dismiss CSC’s Amended Counterclaims and Third-Party Complaint (ECF No. 62)
 18 (“TP-Link Motion”);

19 WHEREAS, TP-Link has agreed to CSC’s request for a three-page expansion of
 20 the page limits provided in L.R. 11-6 for CSC’s anticipated opposition to TP-Link’s
 21 motion under L.R. 7-9; and

22 WHEREAS, the parties state the following:

23 **Careful Shopper’s Good Cause Statement**

24 Good cause exists for the requested expansion because:

25 This is a case of unusual history, breath and depth. Originally filed in the
 26 Eastern District of New York, the proceedings there are relevant to the instant
 27 proceedings, which from Careful Shopper’s standpoint are a *verbatim* repetition. The
 28

1 operative pleading now include a Sherman Act claim and state law intentional tort.
 2 The issues abound, and capable defense counsel have raised issues with a citation that
 3 require significant space to address. Careful Shopper has spent much time paring the
 4 document for unnecessary parentheticals, explanatory matter, argumentative
 5 focusing, and the like. The Table of Contents attests to the extraordinary breath of
 6 subject matter . . . and the economy in treating it:
 7

9 **TABLE OF CONTENTS**

11	Table of Authorities	iv
12	I SUMMARY OF CASE.....	1
13	II FACTUAL BACKGROUND	2
14	III TP-LINK'S ANTI-SLAPP MOTION.....	7
15	A. Timeliness.....	7
16	B. TP-Link's Challenged Conduct is not "Protected" Under anti-SLAPP.	8
17	C. Probability of Prevailing on Counterclaims	11
18	1. The "Probability of Prevailing" Standard.....	11
19	2. TP-Link's Exact Words to Amazon.....	11
20	3. CSC's Pleading of Special Damages	13
21	4. TP-Link's Repeated Counterfeiting Complaints Were Actionable	
22	Tort . . not Mere Opinion	13
23	D. Litigation Privilege.....	14
24	E. Defamation Sufficiently Pled	15
25	F. TP-Link's Interference with CSC's Amazon Relationship was	
26	Accomplished by Wrongful Acts	15
27	IV SHERMAN ACT . . . JOINT COLLABORATION AND EXCLUSIONARY	
28	CONDUCT	17

1	A.	Amazzia is an Actual and/or Potential Competitor of TP-Link.....	17
2	B.	The Amazzia-TP-Link Agreement is the Paradigmatic Agreement in Restraint of Trade.....	19
3	C.	The Complaint Properly Alleges that the Defendants Contracted and Conspired to Eliminate Price Competition for TP-Link Products Sold on Amazon.....	21
4	1.	The Noerr-Pennington Doctrine does not Shield the Sham at Issue Here from Antitrust Scrutiny.....	21
5	2.	<i>Copperweld</i> does not Bar Suit Against Concerted Actors	24
6	3.	CSC Has Suffered Antitrust Injury	26
7	4.	ACC Sufficiently Alleges a Relevant Market.....	27
8	V CONCLUSION	28	

Careful Shopper has been guided in its brief by what it believes the Court needs to fully appreciate the context and grounds of decision.

TP-Link's Statement

TP-Link stipulates to the requested relief as a courtesy and takes no position on Careful Shopper's good cause statement.

NOW THEREFORE, the Parties, by and through their respective counsel, hereby STIPULATE AND AGREE as follows:

CSC's page limit for its memorandum of points and authorities opposition to TP-Link's Motion may be expanded to 28 pages.

Dated: January 23, 2020

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37 Counterclaimant and Third-Party
38 Plaintiff Careful Shopper, LLC*

SIGNATURE ATTESTATION

I hereby attest that the other signatories listed, on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: January 23, 2020

LTL ATTORNEYS LLP

By: /s/ Heather F. Auyang